

# **EXHIBIT BB**



POM 902

## Asset Protection Prescription Area Security

**Introduction** This operation manual information and guidelines are related to securing the pharmacy area. The prescription filling area is considered a secure area. Only authorized persons are allowed access. It is every pharmacy associate's responsibility to understand and ensure compliance with this policy.

**Pharmacist on Duty** Each pharmacist on duty is responsible for the security of the prescription area. The pharmacy manager or pharmacist-in-charge may have additional responsibilities relating to prescription area security according to state law. Any questions regarding legal liabilities or responsibilities should be referred to Regulatory Affairs. The Regulatory Affairs Directors will consult with legal as necessary.

Whenever there is not a pharmacist present in the pharmacy department, the prescription area must be **secured**. Securing the pharmacy includes:

- Relocate the Will Call Bin to the inside of the prescription filling area, if needed.
- Ensure all associates vacate the prescription filling area.
- Close and lock all pharmacy windows and doors.
- Ensure the prescription filling area lights remain **on**.
- Ensure pharmacy alarm is set.

If there is only one pharmacist on duty, and that pharmacist must leave for an extended period, some states require a sign stating "Pharmacist Not On Duty." To obtain a company approved sign contact your market health and wellness manager (MHWM).

**Notes:**

- Access to the prescription area and prescription check out through TaSCO is allowed only when a pharmacist is present.
- If the pharmacist must leave the pharmacy department, and there is not another pharmacist on duty, the prescription filling area must be secured. The pharmacy department includes the prescription filling area and over-the-counter (OTC) area.

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### Security of Filled Orders

Do not process prescriptions through TaSCO or release prescriptions to customers unless a registered pharmacist is on duty and present in the prescription filling area.

Prescriptions must remain in the secured prescription filling area until released to the customer. Prescriptions cannot be left at the courtesy desk or with a management associate for customer pick-up.

### Security of Prescription Filling Area

Access to keys for the prescription area and CII drawers is limited to pharmacists working in that pharmacy. A Supra Lock box is used for stores with multiple relief pharmacists that need keys to access the pharmacy and CII drawer. The Supra Lock box should be located according to Policy AP-05 Key and Door Controls.

- The C-II drawer must be locked at all times, except when a drug is being removed or returned to that particular drawer. Only a licensed pharmacist can have access to the C-II drawer.
- There may be instances where a non-pharmacy associate needs access to the pharmacy.
  - \* Each pharmacist on duty is responsible for controlling access to the prescription filling area.
  - \* A pharmacist must verify any work order with Store management prior to allowing repair persons entry into the pharmacy.
  - \* A pharmacist must verify the identity of any federal, state, or local regulatory agent requesting access.
  - \* A pharmacist must verify the identity and status of any person not assigned to that pharmacy before granting access.
  - \* A pharmacist must be present while non-pharmacy associates are in the prescription area,
  - \* A pharmacist must supervise the activity or assign an hourly pharmacy Associate to supervise their activity at all times.

**Note:** Under **no circumstances** are non-pharmacy associates granted unsupervised access to the prescription filling area.

- Each pharmacist on Duty must ensure the Company's assets are protected while ensuring HIPAA compliance.
  - \* Complete the HIPAA Maintenance Log in accordance with POM 1622.
- There are **no circumstances** in which a delivery driver or courier (McKesson, DHL, Fed-Ex, UPS, USPS, etc.) is permitted to enter the prescription filling area.

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### Personal Belongings

Only pharmacists may have personal belongings in the pharmacy area, including stockrooms. This includes items such as coats, jackets, umbrellas, purses, etc. These items are to be kept to a minimum. Purses are kept in a drawer in the prescription area. Keep all personal items out of the customer's view. All other associates must store these items, as well as all purchases, in their locker, vehicles, or other designated area.

**Notes:**

- Pharmacists can **not** bring briefcases or non-business related items into the pharmacy area. Store these items in a locker or suitable back office area.
- MHWM may bring briefcases into the pharmacy for business purposes only.
- Clear all briefcases through the courtesy desk upon entering and exiting the facility. Open briefcases for visual inspection.

### General Controls

Only use clear trash bags in the pharmacy area.

All lights in the prescription area are to be left on at all times, including after the close of business. This ensures good CCTV coverage in the event of a pharmacy breach.

Pharmacy technicians are required to take breaks in accordance with PD-07, Break and Meal Periods. Technicians are prohibited from taking required breaks inside the pharmacy area. Breaks will be taken in the break/meeting room, or other designated area.

### Pharmacy Keys

Only a pharmacist may have access to the keys for the prescription area, CII cabinet or drawer, and cash register. Each pharmacist must keep the keys on his or her person at all times.

"Master" or "Tiered" pharmacy keys are prohibited. The MHWM should ensure facility management does not possess such a key.

The pharmacy manager must know the location of **all** keys that can access the pharmacy prescription area. If any keys are lost, see your MHWM and AP to review pharmacy key handling procedures, change the locks, and distribute new keys.

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### Pharmacy Keys (Cont'd)

A "Supra Lock box" is available for storage of additional pharmacy keys. The Supra box should be securely fastened to a wall inside the manager's office. Under no circumstance should the Supra Lock box be located in the pharmacy area unless required by state law. Access to the Supra Lock box lock code is limited to pharmacists only.

Adhere to state laws when placing keys in a location for "floater/visiting", part-time, and relief pharmacists. If you need to replace or obtain a Supra Lock box, contact your MHWM.

When creating a Supra box code, do not use:

- Repeating digits (1111, 2222)
- Sequential numbers (1234, 3456)
- Store number
- Telephone number

**Notes:**

- The MHWM must ensure that the pharmacy locks are changed when:
  - \* A change in PIC occurs.
  - \* A pharmacist who has knowledge of the Supra Lock box code separates from the Company.
  - \* An unauthorized entry into the pharmacy has occurred (i.e. break-ins or other breaches).
- Each time the pharmacy alarm codes or locks are changed, the pharmacy Manager must complete a HIPAA Security pharmacy Maintenance Log form. The form is located by going to WIRE> pharmacist Key Resources > Operations > ETQ Binder. The form must be retained in the pharmacy for 6 years.

### Pharmacy Alarm Codes

Each pharmacist should only know the alarm code for the pharmacy they are working in. Do not place the alarm code with the pharmacy keys.

**Note:** Pharmacists will not provide the alarm code to anyone over the telephone, unless they know the person they are speaking with, and that person has authority and reason to enter the pharmacy.

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### Pharmacy Alarm Codes (Cont'd)

As an added precaution, change the alarm code in March and September each year. Contact your MHWM if you do not know how to change the alarm code. When creating alarm codes, do not use:

- Repeating digits (1111, 2222)
- Sequential numbers (1234, 3456)
- Store number
- Telephone number

**Notes:** The MHWM should ensure that the alarm code is changed when:

- A change in PIC occurs.
- A pharmacist who has knowledge of the alarm code separates from the Company.
- An unauthorized entry into the pharmacy has occurred (i.e. break-ins or other breaches).
- Each time the pharmacy alarm codes or locks are changed, pharmacy Manager complete a HIPAA Security pharmacy Maintenance Log form. The form is located by going to WIRE> pharmacist Key Resources > Operations > ETQ Binder. The form must be retained in the pharmacy for 6 years

### Pharmacy Alarm Activations

If the pharmacy alarm sounds, the On Duty Manager will:

- Check the entire outside of the pharmacy for signs of unauthorized entry
- Contact the pharmacist-In-Charge (PIC) immediately.
- Contact the police if it appears there was an unauthorized entry.
- Secure the pharmacy area until the pharmacist arrives.
- Notify the MHWM and MAPM.
- The MHWM will notify HWAP of all breaches to coordinate a complete audit and investigation. (Refer to POM 912 for further guidance).

A “**STOP**” sticker is posted on all pharmacy entrances to serve as a reminder that no one may access the pharmacy without a registered pharmacist being present. Ensure that your pharmacy has this sticker on all doors to the pharmacy. The “Pharmacy Stop Entry Sign” can be ordered through Corporate Signing on your online reference.

**Nobody** will enter the **prescription area** until the pharmacist arrives.

Asset Protection will review all CCTV tapes of the pharmacy area to determine cause of breach.

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**State Requirements** Adhere to state requirements regarding prescription area security including notification regarding changes in personnel, changes in hours, and changes in locks due to lost keys.

It is the responsibility of each pharmacist to notify the State Board of Pharmacy of any changes in job status, according to the guidelines established by the State Boards of Pharmacy.

**Non-pharmacist Support Personnel** Pharmacy managers are to ensure that support personnel understand their obligations and responsibilities related to their privilege to access the prescription area.

**Dispensing Controlled Substances** In order to maintain security of controlled substances during the dispensing process, follow the Connexus procedure for dispensing controlled substances. Refer to POM 903, Filling Schedule II Prescriptions, for this procedure.

**OTC Security** Various items are tagged with EAS (Electronic Article Surveillance) by the supplier.

- Condoms
- Pregnancy tests
- Prilosec
- Diabetic Glucose Monitors

To avoid false alarms, please ensure that all merchandise sold in the pharmacy is deactivated for the customer prior to bagging.

Stores using a showcase for OTC items may lock the showcase at the end of the pharmacy business day. Key controls should be consistent with AP-05 (Key and Door Controls)

Stores using a secure dispenser, such as the cabinet used for Glucose Test Strips, should ensure that the dispenser is full and locked prior to leaving for the day.

**Note:** The pharmacy will no longer accept any free samples from vendors.

**Conclusion** Overall security of the pharmacy area relies on the entire pharmacy staff reading and understanding this POM. If you have any questions or concerns, please contact your MHWM.